



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



383616

REPLY TO THE ATTENTION OF:

SR-6J

April 29, 2009

Bruce Merchant, Director
City of Kalamazoo
Department of Public Services
415 Stockbridge Avenue
Kalamazoo, MI 49001

Re: Kalamazoo River/Allied Paper Superfund Site, Allied Paper Landfill OU1

Dear Mr. Merchant,

The United States Environmental Protection Agency (EPA) extends its thanks to the City of Kalamazoo (the City) for its involvement during EPA's review of the work plan for Millenium Holdings LLC's (MHLLC's) study of groundwater at the Allied Paper Landfill Operable Unit (OU1) of the Kalamazoo River/Allied Paper Superfund Site. Input from the City has been invaluable to EPA's review of the groundwater work plan (GWWP).

Your letter dated April 3, 2009, lays out a number of concerns with the groundwater evaluation in the Allied Paper Remedial Investigation Report. Based on prior input from the City, EPA has requested that MHLLC expand upon the groundwater evaluation in the Remedial Investigation (RI) of OU1. The following directives to MHLLC are a direct result of the City's input:

- Review the Conceptual Site Model included in the RI
- Extend the evaluation of vertical and horizontal groundwater flow direction off site.

While I appreciate the concerns expressed in your letter, EPA believes that first determining the direction of groundwater flow, prior to conducting more detailed testing (if necessary), is the most technically sound approach. Therefore, EPA expects to approve the use of static water levels to determine groundwater flow direction, as proposed in the GWWP. As I stated during our April 14, 2009 meeting, if the results of this study suggest that groundwater at OU1 is flowing toward the City well field, EPA will consider additional data collection and evaluation. The information gained by implementing the GWWP will also serve as the basis for determining potential new well locations and sampling, should the additional investigation be necessary.

Mike Wetzl, as a representative the City has received the most recent draft of the GWWP. As previously stated, the City has had a significant role in the evolution of this GWWP through both its participation in three organized meetings (with EPA, Michigan Department of Environmental Quality and MHLLC) and expressing its concerns in our ongoing correspondence. EPA believes

that through these meetings it has received input from the city of Kalamazoo. If after reading the most draft, the City has concerns about the GWWP it has not previously expressed, please share them with me in a letter sent by both regular and electronic mail.

If you have any questions about this letter, please contact me at the following phone number:
(312)353-8983.

Sincerely,



Michael Berkoff, RPM
Superfund Division

Enclosure

cc: J. Saric, EPA
P. Hamblin, EPA
R. Frey, EPA
S. Chummar, EPA
L. Kirby-Miles, EPA
N. Wood-Chi, EPA
M. Wetzl, City of Kalamazoo
J. Spoelstra, KRWC
G. Wager, ASTF
S. Weishar, MHLLC
P. Bucholtz, MDEQ
T. Scully-Granzeier, Arcadis